



**United States Department of the Interior**  
BUREAU OF LAND MANAGEMENT  
Wyoming State Office  
P.O. Box 1828  
Cheyenne, Wyoming 82003-1828



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Instruction Memorandum No. WY-2006- 045

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To: Field Managers  
Attn: Foresters and Fire Management Officers

From: State Director

Subject: Wyoming Forestry Direction

**Program Area:** Public Domain Forestry

**Purpose:** This Instruction Memorandum (IM) establishes direction for the Wyoming Bureau of Land Management (BLM) public domain forestry program. This IM integrates current departmental and bureau direction with ecological objectives for the management of forested lands. The desired future outcome is to have a fully integrated forestry and fuels program addressing forest health and fuels management on a landscape basis with a concentration on restoration of forests and woodlands on BLM lands throughout the state.

**Background:** The importance of Wyoming BLM public domain forests cannot be overstated. Many of these forests are “transitional” forests between the sagebrush/grass steppe and higher elevation forests. These forests serve as:

1. Critical wildlife habitat
2. Are important habitat links and migration corridors
3. Serve as forest expansion zones
4. Are significant socio-economic contributors to the local communities.

The forestry program is a long standing program. The fuels program in its current form was initiated in 2000 as an outgrowth of the 2000 fires and the development of the National Fire Plan. These two programs continued to function independently until 2003 when the first fuels funded foresters were hired. Since then bureau direction has evolved to emphasize combining these programs under a single program of work with similar foci. There are four primary foci that are shared between the programs:

1. Reducing fuels around communities to lessen the potential for a catastrophic wildfire to impact these communities.
2. Salvaging dead and dying timber, focusing on areas with hazardous fuels, considering wildlife habitats, watershed health and forest management concerns.
3. Restoring the forest landscape to its pre-suppression structure, composition and processes as resilient fire adapted ecosystems where possible.
4. Providing economic activities for local communities.

These objectives are compatible and working in concert efficiencies can be gained. More areas in critical need can be treated to accomplish the goals of both programs. These emphasis items are supported by the goals of the 10 Year Comprehensive Strategy and Implementation Plan:

1. Improve Prevention and Suppression
2. Reduce Hazardous Fuels
3. Restore Fire Adapted Ecosystems
4. Promote Community Assistance

All of the goals are directly related to forestry and fuels. The 10 Year Comprehensive Strategy and Implementation Plan details the roles and responsibilities.

Attachment 1 is a selected bibliography for the current laws, policy, and ecological information.

**Policy/Action:** The forestry program will be driven primarily by ecological objectives while promoting economic and social benefit. The ultimate goal is to restore as much as feasible the pre-suppression forest and woodlands structure, composition, and processes on lands managed by the Wyoming BLM to maximize the ecosystem's resilience to the natural disturbance regimes. Full ecological restoration will not be achieved if the projects and approaches undertaken do not restore the natural fire regime.

In order to do this, the existing forest structure should be utilized. Restoration efforts must utilize existing forest structure. Maximizing the use of existing forest structure can restore historic forest structure conditions more quickly than trying to immediately replicate pre-suppression tree positions. Then underlying processes of natural tree regeneration and mortality need to be accounted for in restoration design.

The restoration of the forests and woodlands also require re-establishing the forest understory of herbaceous plants, shrubs, snags, and dead and down materials. The forest understory is critical in wildlife habitat, tree re-generation patterns, biodiversity, and watershed function. All of these are critical elements in the ecosystem and are critical elements in proper soil microorganism functions.

Old and large trees should be preserved while maintaining the structural diversity and resilience of the forest/woodland stands. These old trees, especially those established pre-suppression are important forest components and are critical to the functionality of ecosystem components. Emphasis needs to be placed on managing the forests and woodlands to preserve the largest and oldest trees on a landscape basis and focusing treatments on the high numbers of small diameter young trees. Spatial variability within the landscape includes not only the retention of old growth trees but also the appropriate age class distributions of all trees. Trees exhibiting old growth morphology should generally be kept regardless of size or form to provide visual and genetic diversity, unless:

1. They are contributing to an insect or disease outbreak,
2. Their removal is needed to meet the restoration goals of reducing basal area (to approximately 50-60 BA/Acre), or
3. To insure the proper mix of different age cohorts within the stand.

Even age management may be appropriate in lodgepole pine, aspen, and subalpine fir stands that historically exhibited even aged stand characteristics under pre-suppression forest disturbance patterns.

Restoring the ecosystem requires both the restoration of process and structure. Natural disturbance processes including wildland fire, droughts, and insect infestations are the natural shapers of the forest and woodlands. Fire regimes and stand structure are interrelated. Mechanical treatments alone will not re-establish the natural disturbance regime. In altered stands though, mechanical treatments may well be needed as a precursor to re-establishing the pre-suppression structure and process.

The forests and woodlands managed by the Wyoming BLM must be managed to restore the historic tree species composition and structure. Fire suppression and other management activities have allowed fire sensitive and shade tolerant species to become more prevalent. Landscapes need to be managed for composition and structure that approximates the natural (historic) range of variability.

**Priorities:** The following timber/woodlands systems are the priorities for forestry work in Wyoming BLM.

1. **Forest Health.** Insects and disease have always been part of the natural disturbance regime of the ecosystem. Past management practices as well as climatic factors have allowed the insects and disease to expand from an endemic naturally occurring population and distribution to a more widespread phenomenon. Stands that are significantly impacted by insects and disease need to be aggressively managed. By returning these stands to pre-suppression structure and composition, forest health will be improved and the risk to disease and insect infestations will be reduced to the endemic levels. It must be realized though that there will always be outbreaks of insect infestations and disease as they are natural part of the disturbance regime of the forests.
2. **Wildland Urban Interface.** Reducing fuels in the wildland urban interface is a mandated congressional and departmental priority. While good silvicultural practices need to be followed as much as possible, the primary emphasis in the wildland urban interface is to reduce fuel loadings and change the structure and composition of the forests and woodlands to reduce the risk of catastrophic fire to a community.
3. **Old Growth Forests.** Healthy Forest Restoration Act (HFRA) provides the framework for development in the Resource Management Plans (RMP) of clear direction to manage old growth stands. Projects in old growth stands must “. . . fully maintain, or contribute toward the restoration of, the structure and composition of old growth stands according to pre-fire suppression old growth conditions characteristic of the forest type . . . .”
4. **Aspen Stands.** Aspen stands provide critical habitat for multiple wildlife species, watershed protection, and visual resource management. Many of the aspen stands on public lands are in a state of decline and are on the outside ranges of the historical range of variability. They are being encroached upon by conifers and at lower elevations by sagebrush. Rejuvenating these stands through conifer harvesting and prescribed fire will not only improve the overall health of the land, but healthy aspen stands also serve as nature’s fuel breaks, reducing the potential for catastrophic fire in the forests and enabling wildland fire to play its role in the ecosystem. Harvesting of mature to over-mature aspen within a pure aspen stand may also be needed to generate young aspen reproduction and preserve clonal health through periodic aspen tree replacement.
5. **Ponderosa Pine.** Past management practices have allowed some of the ponderosa pine stands in Wyoming to become even aged, overstocked, and prone to disease and stand replacement fires. The commonly accepted southwestern United States model for ponderosa pine does not necessarily apply to the ponderosa pine stands in Wyoming. Recent research in the front range of Colorado suggests a much more varied fire regime ranging from the commonly accepted frequent understory non-lethal fires to a mixed severity fire regime occurring at much longer fire return intervals.

6. **Juniper and Limber Pine Woodlands.** These woodlands have been an important part of the lower elevation ecosystem, providing wildlife habitat and thermal cover as well as watershed protection. However past management practices have allowed these woodlands to expand into the alluvial fans and deeper soils replacing the sagebrush/grass vegetation. Important management objectives for these woodlands are to:
  - a. Restoration to their natural position on the landscape,
  - b. Insure that wildlife cover is adequately maintained, and
  - c. To provide forest products as possible from these stands.

**Planning and National Environmental Policy Act (NEPA):** There have been several significant changes in the planning processes since 2002. It is the Bureau direction that the three processes listed below be used for all hazardous fuels and forest health projects, unless there are mitigating issues such as the presence of threatened and endangered species.

1. **Healthy Forest Initiative (HFI) Categorical Exclusions:** HFI has given the Bureau authority to use Categorical Exclusions on mechanical projects of less than 1,000 acres and prescribed fires of less than 4,500 acres if Hazardous Fuels Reduction is the primary reason for the proposed action. This direction excludes chemical treatments, lands in wilderness or wilderness study areas, and any project with road construction. This authority may include the sale of vegetative material if the primary purpose is hazardous fuels reduction.
2. **Streamlined Environmental Assessment (EA):** In 2002 the Council on Environmental Quality issued new guidance on the EA process for forest health projects. This streamlines the EA process and limits EA length to 10-15 pages.
3. **Healthy Forest Restoration Act (HFRA) EA:** HFRA establishes procedures to be used for EA/EIS process for projects identified in Community Wildfire Protection Plans.

Fire Regime and Condition Class will be used as part of the prioritization and project development/justification process for all forestry projects. The Congress has mandated that most of our efforts be concentrated in Fire Regimes I, II, and III and condition Classes 2 and 3.

The Wyden amendments to the Appropriations Legislation of 1997 and 1999 give both the forestry and fuels programs the authority to work across ownership boundaries and include private lands within BLM projects.

Stewardship contracting continues to be an emphasis item for the Department and Bureau. Stewardship projects receive high priority in the funding process for both sub-activities.

No forestry project with a fuels objective will be submitted without coordination with the Field Office and/or Zone Fuels Specialists inputs. No fuels project involving forests or woodlands will be submitted without coordination with the Zone forester.

**Administrative:** The following administrative guidelines will be adhered to:

1. **Project Number.** All forestry projects will be issued a fuels project number. In cases where forestry and fuels are co-funding a project the same project number will be used for all aspects of the project.

2. **Program of Work.** Forestry and fuels will have a common program of work. As of this time all forestry projects with a primary or secondary objective of modifying fuels will be entered into the Non-NFP module of the National Fire Plan Operations and Reporting System (NFPORS). It is the forester's responsibility to insure that forestry projects meeting the above objectives are coordinated with the Field Office Fuels Specialist for input and reporting requirements. A common out-year (5 years) planning tool for fuels and forestry is being developed and will be instituted when ready. The same requirements for coordination will apply for this planning tool.
3. **Project Data Entry.** Projects submitted for funding from the 1030, 5900, and 9620 sub-activities will continue to be submitted through the BPS system, and entered into the NFPORS as appropriate. Fuels projects will continue to be submitted through the Hazardous Fuels Module of NFPORS.

**Timeframe:** Effective upon issuance.

**Budget Impact:** There are no anticipated budget impacts.

**Coordination:** This IM was coordinated with the Field Office foresters, WO 200 (Forestry), and with WY 950 (Fire and Aviation Management).

**Contact:** If you have any questions regarding this policy, please contact Bob Means, Wyoming BLM Forestry Program Manager, at (307) 775-6287.

/s/ Robert A. Bennett

1 Attachment:

1 - Selected Bibliography of Laws, Policy Statements and Ecological Studies (1 p.)

### **Selected Bibliography of Laws, Policy Statements and Ecological Studies.**

Healthy Forests Initiative of 2002 (HFI)

The Healthy Forests Initiative and Healthy Forests Restoration Act, Interim Field Guide.

Healthy Forests Restoration Act of 2003 (HFRA).

Energy Policy Act of 2005 (Sections 201 and 210 – Biomass)

Public Law 104-208, September 30, 1996, Section 124. “The 1997 Wyden Amendment”

Public Law 105-277, October 21, 1998, Section 136. “The 1999 Wyden Amendment”

Council on Environmental Quality, December 9, 2002. “Guidance for Environmental Assessments of Forest Health Projects”

A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment, 10 Year Comprehensive Strategy, August 2001.

A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment, 10 Year Comprehensive Strategy, Implementation Plan. May 2002.

Historical Fire Regimes in Ponderosa Pine Forests of the Colorado Front Range, and Recommendations for Ecological Restoration and Fuels Management. CSU. May 18, 2006.

Fire and restoration of pinon-juniper woodlands in the western United States: a review. Forest Ecology and Management. September 2003.

New Mexico Forest Restoration Principles. USDA Forest Service Southwest Region. May 17, 2006.